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19 Ikea U.S. West, Inc., et al.

20 IN THE UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA

22 SUSAN HURTADO, individually and on behalf
23 of all others similarly situated,

24 Plaintiffs,

25 v.

26 IKEA U.S. WEST, INC., a corporation, IKEA
27 DISTRIBUTION SERVICES, INC. a corporation,
28 IKEA NORTH AMERICA CAPITAL, INC., a
corporation, IKEA PROPERTY, INC., a
corporation, IKEA SUPPLY AG, a corporation,
and DOES 1-250,

Defendants.

Case No.: C 11-3156 PJH

**STIPULATION AND [PROPOSED]
ORDER TO TRANSFER ACTION TO
U.S. DISTRICT COURT, SOUTHERN
DISTRICT OF CALIFORNIA**

1 Pursuant to Civil Local Rules 3-13, 7-11 and 7-12, counsel for Susan Hurtado in
2 *Hurtado v. Ikea U.S. West, Inc., et al.*, Case No. C 11-3156-PJH, and counsel for defendant
3 Ikea U.S. West, Inc., et al. ("Ikea") jointly submit the following Stipulation that the above-
4 mentioned action be transferred to United States District Court for the Southern District of
5 California.

6 WHEREAS, two putative class actions are pending against Ikea in the Southern District
7 of California (*Medellin v. Ikea U.S. West, Inc.*, No. 3:11-CV-00921-WQH(BGS), filed
8 February 14, 2011, and *Yeoman v. Ikea U.S. West., Inc.*, No. 3:11-CV-00701-WQH(BGS),
9 filed March 2, 2011);

10 WHEREAS, each of the *Medellin* and *Yeoman* actions concerns substantially the same
11 parties, transactions and events, and the potential for unduly burdensome duplication of labor
12 and expense and conflicting results exists if the cases are in separate jurisdictions;

13 WHEREAS, the *Medellin* action is the lowest-numbered case;

14 WHEREAS, the plaintiffs in the *Medellin* and *Yeoman* actions are in the process of
15 consolidating their complaints and have agreed to consolidate the *Hurtado* action once
16 transferred to the Southern District;

17 THEREFORE, the parties hereby stipulate and agree:

18 The action of *Hurtado v. Ikea U.S. West, Inc.*, Case No. C 11-3156-PJH should be
19 transferred to the Southern District of California.

20
21 Date: 11/21/2011

/s/ Hallie Von Rock

22 _____
Hallie Von Rock
23 Attorney for Plaintiff Susan Hurtado

24
25 Date: 11/21/2011

/s/ Kenneth Kawabata

26 _____
Kenneth Kawabata
27 Attorney for Defendant Ikea U.S. West, Inc.
28

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

The action of *Hurtado v. Ikea U.S. West, Inc.*, Case No. C 11-3156-PJH, shall be transferred to the Southern District of California.

Date: 11/22/11

